

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Jane Doe 1, Jane Doe 2, Jane Doe 3, Jane Doe )	Civil Action No.: 6:22-cv-02957-HMH
4, Jane Doe 5, Jane Doe 6, Jane Doe 7, John )	
Doe 1, John Doe 2, and John and Jane )	
Does 1-100, )	
) )	
Plaintiffs, ) )	
v. ) )	
) )	
Varsity Brands, LLC; Varsity Spirit, LLC; ) )	
Varsity Brands Holding Company, Inc.; U.S. ) )	
All Star Federation; Jeff Webb; Rockstar ) )	
Cheer & Dance, Inc.; Katherine Anne Foster ) )	
as the Personal Representative ) )	
of the Estate of Scott Foster; Kathy Foster, ) )	
Individually, Kenny Feeley; Josh Guyton; ) )	
Nathan Allan Plank; Christopher Hinton; ) )	
Tracy a/k/a or f/k/a Traevon Black; Peter ) )	
Holley; and other Unknown Defendants, ) )	
) )	
Defendants. ) )	

Jane Doe 8, )	Civil Action No.: 6:22-cv-03508-HMH
) )	
Plaintiff, ) )	
v. ) )	
) )	
Varsity Brands, LLC; Varsity Spirit, LLC; ) )	
Varsity Brands Holding Company, Inc.; ) )	
U.S. All Star Federation, Inc. d/b/a U.S. ) )	
All Star Federation; Jeff Webb, individually; ) )	
Rockstar Cheer & Dance, Inc.; Katherine ) )	
Anne Foster as the Personal Representative ) )	
of the Estate of Scott Foster; Kathy Foster, ) )	
Individually; Josh Guyton; Christopher ) )	
Hinton; Traevon a/k/a Trey Black n/k/a ) )	
Tracey Black; and other Unknown ) )	
Defendants, ) )	
) )	
Defendants. ) )	

Jane Doe 9, ) Civil Action No.: 6:22-cv-03509-HMH  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 Varsity Brands, LLC; Varsity Spirit, LLC; )  
 Varsity Brands Holding Company, Inc.; )  
 U.S. All Star Federation, Inc. d/b/a U.S. )  
 All Star Federation; Jeff Webb, individually; )  
 Rockstar Cheer & Dance, Inc.; Katherine )  
 Anne Foster as the Personal Representative )  
 of the Estate of Scott Foster; Kathy Foster, )  
 Individually; Josh Guyton; Traevon Black )  
 a/k/a Trey Black n/k/a Tracey Black; and )  
 other Unknown Defendants, )  
 )  
 Defendants. )

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John Doe 3, ) Civil Action No.: 6:22-cv-03510-HMH  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 Varsity Brands, LLC; Varsity Spirit, LLC; )  
 Varsity Brands Holding Company, Inc.; )  
 U.S. All Star Federation, Inc. d/b/a U.S. )  
 All Star Federation; Jeff Webb, individually, )  
 Rockstar Cheer & Dance, Inc.; Katherine )  
 Anne Foster as the Personal Representative )  
 of the Estate of Scott Foster; Kathy Foster; )  
 Traevon Black a/k/a Trey Black n/k/a )  
 Tracey Black; Jarred Carruba; and other )  
 Unknown Defendants, )  
 )  
 Defendants. )

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**PLAINTIFFS' EXPERT DISCLOSURES PURSUANT TO RULES 26(B) AND (C)  
(FILED UNDER SEAL)**

Pursuant to Rule 26(B) and (C) of the Federal Rules of Civil Procedure (FRCP), as well as all applicable local rules, Plaintiffs file this disclosure, and designate the following experts who may be called upon during a trial of this matter to testify on behalf of all Plaintiffs:

**A. Experts Pursuant to Rule 26(B), FRCP:**

1. Gaye Allen-Cook, BS, MA, QMHP, LPC  
1947-D Hoffmeyer Road  
Florence, South Carolina 29501

Plaintiffs have included Ms. Allen-Cook's current Curriculum Vitae and will supplement this identification upon receipt of her report(s).

2. R. Leslie Nichols, CPOP, MSSA  
R.L. Nichols & Associates, LLC  
1739 University Avenue, Suite 228  
Oxford, MS 38655

Plaintiffs have included Mr. Nichol's current Curriculum Vitae and will supplement this identification upon receipt of his report(s).

3. Debbie L. Caskey, CVE, CLCP, CRC, CCM, CDMS  
Vocational & Disability Assessments, Inc.  
Charlotte, NC 28269

Plaintiffs have included Ms. Caskey's Curriculum Vitae and will supplement this identification upon receipt of her report(s).

4. Raymond "Skip" Sauer  
Professor of Economics, Clemson University  
312 Wilbur O. and Ann Powers College of Business  
343 Chandler L. Burns Hall  
Clemson, SC 29634

Plaintiffs have included Mr. Sauer's Curriculum Vitae and will supplement this identification upon receipt of his report(s).

**B. Experts Pursuant to Rule 26(C), FRCP:****1. Jane Doe 1**

- a. Holly Tree Family Practice  
1338 Highway 14  
Simpsonville, South Carolina 29681
- b. Prisma Health Marshall I. Pickens Hospital  
701 Grove Road  
Greenville, South Carolina 29605
- c. Dawn Diermann Treigle, MSW, LCSW  
315 Metairie Road, Suite 102  
Metairie, LA 70005

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses, medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

**2. Jane Doe 2**

- a. Tenafly Pediatrics  
1135 Broad Street  
Clifton, NJ 07013
- b. Atrium Health Primary Care Cabarrus Family Medicine  
12925 US-601, Suite 300  
Midland, North Carolina 28107
- c. Novant Health Arbor Pediatrics  
2927 Lyndhurst Avenue  
Winston-Salem, North Carolina 27103
- d. Dawn Diermann Treigle, MSW, LCSW  
315 Metairie Road, Suite 102  
Metairie, LA 70005

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**3. Jane Doe 3**

- a. Resilient Mind Counseling, PLLC  
41 Clayton Street, #300  
Asheville, North Carolina 28801
- b. Melissa Piazza Richard, LCSW, LLC  
1046 North Carroll Avenue  
New Orleans, LA 70119

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses, medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

**4. Jane Doe 5**

- a. Parkside Pediatrics  
211 Batesville Road  
Simpsonville, South Carolina 29681
- b. Dawn Diermann Treigle, MSW, LCSW  
315 Metairie Road, Suite 102  
Metairie, LA 70005

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expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

**5. Jane Doe 6**

- a. Harmony Hills  
18121 Boys Ranch Road  
Altoona, Florida 32702
- b. Focus Forward Counseling and Consulting  
5971 Parkway North Boulevard, Suite 110  
Cumming, Georgia 30040
- c. Resurgens Orthopedics  
6335 Hospital Parkway, Suite 200  
Johns Creek, Georgia 30097
- d. North Chattahoochee Family Physicians  
11549 Johns Creek Parkway, Suite 250  
Johns Creek, Georgia 30097

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**6. Jane Doe 7**

- a. Asheville Children's Medical Center  
7 Vanderbilt Park Drive, Suite 100A  
Asheville, North Carolina 28803
- b. Safelight  
317 North Washington Street  
Hendersonville, North Carolina 28739

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses,

medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

7. **Jane Doe 8**

- a. Boones Creek Medical, PLLC  
1000 West Jackson Boulevard, Suite 5 & 6  
Jonesborough, Tennessee 37659

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses, medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

8. **Jane Doe 9**

- a. Children's Medical Center – Simpsonville  
307 North Main Street  
Simpsonville, South Carolina 29681
- b. Prisma Health Pediatrics – Spartanburg  
249 North Grove Medical Park Drive, Suite 100  
Spartanburg, South Carolina 29303
- c. Sherbondy's Psychiatric Solutions  
225 Aldey Way  
Greenville, South Carolina 29607
- d. Prisma Health Marshall I. Pickens Hospital  
701 Grove Road  
  
Greenville, South Carolina 29605

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses,

medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

**9. John Doe 1**

- a. Southern Hills Pediatrics  
5775 South Fort Apache Road, #110  
Las Vegas, Nevada 89148
- b. Melissa Piazza Richard, LCSW, LLC  
1046 North Carroll Avenue  
New Orleans, LA 70119

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses, medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

**10. John Doe 2**

- a. Prisma Health Primary Care  
876 West Faris Road  
Greenville, South Carolina 29605
- b. Phoenix Center  
P.O. Box 1948  
Greenville, South Carolina 29602

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses, medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

12. **John Doe 3**

- a. Family Medicine of Abbeville  
901 West Greenwood Street  
Abbeville, South Carolina 29620
- b. Aurora Pavilion Behavioral Health  
655 Medical Park Drive  
Aiken, South Carolina 29801
- c. Beckman Center for Mental Health Services  
1547 Parkway  
Greenwood, South Carolina 29646
- d. Beyond Abuse  
115 East Alexander Avenue  
Greenwood, South Carolina 29646
- e. Spartanburg Regional Medical Center  
101 East Wood Street  
Spartanburg, South Carolina 29303
- f. Dawn Diermann Treigle, MSW, LCSW  
315 Metairie Road, Suite 102  
Metairie, LA 70005

Plaintiff received care and treatment from the aforementioned providers related to the injuries alleged in this matter and these providers are familiar with Plaintiff's clinical diagnoses, medical condition(s), past treatment and future treatment needs. These providers are therefore expected to testify regarding their care, the medical necessity of this care, any potential future care, and any other information on which they are deemed competent to testify.

*Signature Page to Follow*

**MCGOWAN, HOOD, FELDER & PHILLIPS,  
LLC**

s/ S. Randall Hood

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*Attorneys for Plaintiffs Jane Doe 1, Jane Doe 3,  
Jane Doe 8 and Jane Doe 9*

Rock Hill, South Carolina

December 4, 2023